

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Nicole McDaniels, : Chapter 13  
Debtor : Case No. 21-13245-amc**

**CERTIFICATION OF DEFAULT**

I, Stephen V. Bottiglieri, Esquire, attorney for Movant, Delaware County Tax Claim Bureau, certify that Debtor has defaulted upon the terms of the Stipulation of Settlement of the Motion for Relief regarding 59 Price Avenue, Lansdowne, Delaware County, Pennsylvania, bearing Folio No.: 23-00-02773-00, Pennsylvania filed on August 26, 2024 at Doc. 61 and approved by this Court on September 5, 2024 at Doc. 63.

It is further certified that the attached notice dated March 11, 2025 was served upon the non-filing Co-Debtor, Debtor and Debtor's Attorney on March 11, 2025. Subsequent to said Notice, the Debtor has failed to cure the default. Accordingly, the Court shall enter the attached Order granting the Moving Party relief from the Automatic Stay.

**TOSCANI, STATHES & ZOELLER, LLC**

Date: July 8, 2025

**BY:** /s/Stephen V. Bottiglieri  
Stephen V. Bottiglieri, Esquire  
Attorney for Delaware County Tax Claim Bureau  
899 Cassatt Road, Suite 320  
Berwyn, PA 19312  
P 610-647-4901  
[sbottiglieri@tszlegal.com](mailto:sbottiglieri@tszlegal.com)

**TOSCANI, STATHES & ZOELLER, LLC**

ATTORNEYS AT LAW

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\*\* Of Counsel; Member PA, NJ & DC Bar

March 11, 2025

**VIA EMAIL ONLY**

Michael A. Cibik, Esquire  
Cibik Law, PC  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102

**VIA FIRST CLASS MAIL ONLY**

Nicole McDaniels  
59 Price Avenue  
Lansdowne, PA 19050

**RE: In re: Nicole McDaniels, Chapter 13 No.: 21-13245-amc  
59 Price Avenue, Lansdowne, Folio No.: 23-00-02773-00**

Dear Mr. Cibik, and Ms. McDaniels:

Kindly allow this letter to serve as a Notice of Default of the Stipulation of Settlement in the above case. The Stipulation is in default due to the failure to timely pay the 2024 real estate taxes due on 59 Price Avenue, Lansdowne. A copy of the 2024 real estate taxes due, as of March 2025, are enclosed for your review.

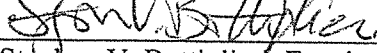
To cure this default, payment in the amount of **\$6,488.30** must be received by the Delaware County Tax Claim Bureau within fourteen (14) days of the date of this letter. **Payment must be made by certified funds or money order made payable to the Delaware County Tax Claim Bureau. Write your name, address and folio number on the payment and remit to:**

**Delaware County Tax Claim Bureau  
Government Center Building  
201 W. Front Street  
Media, PA 19063**

If the payment of the 2024 real estate taxes is not timely received, our office will certify the default with the Court. Thank you in advance for your prompt attention to this matter.

Very truly yours,

**TOSCANI, STATHES & ZOELLER, LLC**

BY:   
Stephen V. Bottiglieri, Esquire

Encl.

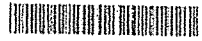
cc: Delaware County Tax Claim Bureau (w/o encl.)  
Anthony McDaniels, Sr. (w/encl.)



DELAWARE COUNTY TAX CLAIM BUREAU ESTIMATED TAX STATEMENT

DT520PADEL  
Rev. 01/18

Delq Year : 2024 Type: ANNUAL Cert :  
Parcel No : 23-00-02773-00  
Owner1 : MCDANIELS ANTHONY SR & Owner2 : MCDANIELS NICOLE  
Property Location : 59 PRICE AVE Desc : 2 STY HSE GAR  
Date : 03/04/2025 Balance Due as of : 03/2025



DELINQUENT REAL ESTATE TAXES

		BILLING	PENALTY	INTEREST	TOTAL DUE
COUNTY	CHG	0.00	0.00	0.00	0.00
ASSMT: 204830	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	0.00	0.00	0.00	0.00
SCHOOL	CHG	5,796.80	579.68	47.82	6,424.30
ASSMT 204830	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	5,796.80	579.68	47.82	6,424.30
MUNICIPALITY	CHG	0.00	0.00	0.00	0.00
ASSMT: 204830	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	0.00	0.00	0.00	0.00
COST	CHG	64.00	0.00	0.00	64.00
	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	64.00	0.00	0.00	64.00
TOTAL	CHG	5,860.80	579.68	47.82	6,488.30
	PAY	0.00	0.00	0.00	0.00
	NET	5,860.80	579.68	47.82	6,488.30

L.B.F. 9014-4

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Nicole McDaniels : Chapter 13  
:  
Debtor : Bky. No. 21-13245-amc

\* \* \* \* \*

CERTIFICATION OF SERVICE

I, Stephen V. Bottiglieri, certify that on July 8, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Certification of Default

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Date: 7/8/2025

/s/ Stephen V. Bottiglieri  
Stephen V. Bottiglieri, Esq. No. 87343  
Toscani, Stathes & Zoeller, LLC  
899 Cassatt Road, Suite 320  
Berwyn, PA 19312  
(610) 647-4901  
sbottiglieri@tszlegal.com

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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Name: Nicole McDaniels  
Address: 59 Price Avenue, Lansdowne, PA 19050  
Relationship of Party: Debtor

Via: CM/ECF ☒ 1st Class Mail Certified Mail e-mail:  
Other:

Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Name: Anthony McDaniels, Sr.  
Address: 59 Price Avenue, Lansdowne, PA 19050  
Relationship of Party: Non-filing Co-Debtor  
Via: CM/ECF ☒ 1st Class Mail Certified Mail e-mail:  
Other:

Name: Kenneth E. West, Esquire  
Address: 190 N. Independence Mall West, Suite 701, Philadelphia, PA 19106  
Relationship of Party: Chapter 13 Standing Trustee  
Via: X CM/ECF 1st Class Mail Certified Mail e-mail:  
Other:

Name: Office of the United States Trustee  
Address: Robert N.C. Nix Federal Building, 900 Market Street, Suite 320, Philadelphia, PA 19107  
Relationship of Party: United States Trustee  
Via: X CM/ECF 1st Class Mail Certified Mail e-mail:  
Other:

Name: Michael A. Cibik, Esquire  
Address: Cibik Law, P.C., 1500 Walnut Street, Ste 900, Philadelphia, PA 19102  
Relationship of Party: Attorney for Debtor  
Via: X CM/ECF 1st Class Mail Certified Mail e-mail:  
Other: